

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :

v. :

ANDRE SEBASTON CHAMBERS :

1:22CR 174 -1



The Grand Jury charges:

*Introductory Allegations*

1. At all times relevant to this Indictment:

a. ANDRE SEBASTON CHAMBERS was a resident of the Eastern District of North Carolina.

b. Marcus Alan Thomas was a resident of the Middle District of North Carolina.

c. Individual-1 was a real person who resided in Maryland.

d. Individual-2 was a real person who resided in Wyoming.

e. Individual-3 was a real person who resided in North Carolina.

f. Individual-4 was a real person who resided in North Carolina.

g. Individual-5 was a real person who resided in Virginia.

h. Individual-6 was a real person who resided in North Carolina.

i. Individual-7 was a real person who resided in Illinois.

j. Individual-8 was a real person who resided in California.

*The Scheme to Defraud*

2. From on or about August 27, 2018, continuing up to and including on or about February 13, 2019, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and divers other persons, known and unknown to the Grand Jurors, did devise and intend to devise a scheme and artifice to defraud and for obtaining money or property, through material false pretenses, representations, and promises, by creating false and fraudulent financial accounts for the purpose of using such accounts to make fraudulent wire transfers for the benefit of Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, all under the false pretenses and representations that such transactions were legitimate and authorized when in fact they were being conducted by Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, for their own benefit and gain, and for the benefit and gain of others, such scheme and artifice to defraud making use of the writings, signs, signals, pictures, and sounds of interstate commerce.

*Manner and Means*

3. It was the purpose of the scheme for Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, to enrich themselves by obtaining money and property from individuals who paid Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS to transfer money and property unlawfully, including through the sale of cryptocurrency.

4. It was a part of the scheme that Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, obtained and possessed unlawfully the personal identifying information of various individuals.

5. It further was a part of the scheme that Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, used the personal identifiable information of various individuals to create false and fraudulent financial accounts.

6. It further was a part of the scheme that Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, used the false and fraudulent financial accounts for the purpose of executing unlawful transfers of money and property.

7. It further was a part of the scheme that Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, executed unlawful transfers of money and property for the purpose of enriching themselves and others.

#### COUNT ONE

8. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

9. From on or about August 27, 2018, continuing up to and including on or about February 13, 2019, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and divers other persons, known and unknown to the Grand Jurors, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

10. It was a part and an object of the conspiracy that the defendants, Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others known and unknown to the Grand Jurors, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of material false and fraudulent pretenses,

representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit: Marcus Alan Thomas, ANDRE SEBASTON CHAMBERS, and others not named herein perpetrated a scheme to enrich themselves by engaging in unlawful transfers of money and property, and, in connection therewith and in furtherance thereof, the conspirators, including Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, transmitted and caused to be transmitted interstate and foreign transfers of funds from, through, and to the Middle District of North Carolina.

All in violation of Title 18, United State Code, Sections 1343 and 1349.

## COUNT TWO

11. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

12. On or about August 27, 2018, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and

sound, to wit: a money transfer by wire in the amount of \$2,350; in violation of Title 18, United States Code, Sections 1343 and 2.

### COUNT THREE

13. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

14. On or about August 27, 2018, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Two and incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-1; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

### COUNT FOUR

15. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

16. On or about October 4, 2018, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire

communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$1,350; in violation of Title 18, United States Code, Sections 1343 and 2.

#### COUNT FIVE

17. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

18. On or about October 4, 2018, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Four and incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-2; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

#### COUNT SIX

19. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

20. On or about November 19, 2018, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice

to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$1,000; in violation of Title 18, United States Code, Sections 1343 and 2.

#### COUNT SEVEN

21. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

22. On or about November 19, 2018, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Six and incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-3; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

#### COUNT EIGHT

23. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

24. On or about December 15, 2018, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE



SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$1,260; in violation of Title 18, United States Code, Sections 1343 and 2.

#### COUNT NINE

25. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

26. On or about December 15, 2018, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Eight and incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-4; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

#### COUNT TEN

27. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

28. On or about January 17, 2019, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$2,100; in violation of Title 18, United States Code, Sections 1343 and 2.

#### COUNT ELEVEN

29. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

30. On or about January 17, 2019, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Ten and incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-5; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

## COUNT TWELVE

31. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

32. On or about January 24, 2019, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$1,100; in violation of Title 18, United States Code, Sections 1343 and 2.

## COUNT THIRTEEN

33. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

34. On or about January 24, 2019, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Twelve and incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-6; in

violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

#### COUNT FOURTEEN

35. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

36. On or about February 1, 2019, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$2,500; in violation of Title 18, United States Code, Sections 1343 and 2.

#### COUNT FIFTEEN

37. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

38. On or about February 1, 2019, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Fourteen and incorporated by reference herein, knowingly used, without lawful authority, a

means of identification of another person, to wit: the name of Individual-7; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

#### COUNT SIXTEEN

39. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

40. On or about February 7, 2019, in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, for the purpose of executing the scheme and artifice to defraud described above, caused to be transmitted by means of wire communication in interstate commerce a writing, sign, signal, picture, and sound, to wit: a money transfer by wire in the amount of \$2,000; in violation of Title 18, United States Code, Sections 1343 and 2.

#### COUNT SEVENTEEN

41. The Introductory Allegations set forth in paragraphs 1 through 7 of this Indictment are realleged and incorporated as if fully set forth herein.

42. On or about February 7, 2019, in in the County of Durham, in the Middle District of North Carolina, Marcus Alan Thomas and ANDRE SEBASTON CHAMBERS, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: wire fraud, in violation of Title 18, United States Code, Section 1343, as alleged in Count Sixteen and

incorporated by reference herein, knowingly used, without lawful authority, a means of identification of another person, to wit: the name of Individual-8; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

### FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 18, United States Code, Section 982(a)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses alleged in Counts One, Two, Four, Six, Eight, Ten, Twelve, Fourteen or Sixteen, the defendant, ANDRE SEBASTON CHAMBERS, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to such offense or a conspiracy to commit such offense.

3. Upon conviction of one or more of the offenses alleged in Counts One, Two, Four, Six, Eight, Ten, Twelve, Fourteen or Sixteen, the defendant, ANDRE SEBASTON CHAMBERS, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation.

4. The property to be forfeited includes but is not limited to a money judgment in an amount equal to the total amount subject to forfeiture.

5. If, as a result of any act or omission of the defendant, any property subject to forfeiture:

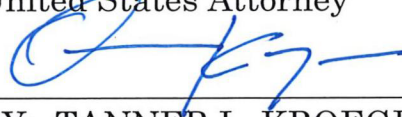
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person or entity;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 18, United States Code, Sections 981(a)(1)(C), Title 18, United States Code, Sections 982(a)(1), Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: May 31, 2022

SANDRA J. HAIRSON  
United States Attorney



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BY: TANNER L. KROEGER  
Assistant United States Attorney

A TRUE BILL:



~~FOREPERSON~~